

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

IN RE ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL 2327 JOSEPH R. GOODWIN U.S. DISTRICT JUDGE
THIS DOCUMENT RELATES TO: ETHICON WAVE 2 CASES LISTED IN EXHIBIT A	

**NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSE OF
ELIZABETH KAVALER, M.D. FOR WAVE 2**

Comes now, the Defendants, and hereby adopt and incorporate by reference the Daubert response filed in relation to Elizabeth Kavalier, M.D. in Ethicon Wave 1, Case No. 2:12-md-02327, ECF No. 2165 (memorandum in support of opposition). Defendants respectfully request that the Court deny Plaintiffs' motion, for the reasons expressed in the Wave 1 response briefing. This notice applies to the Wave 2 cases identified in Exhibit A attached hereto.

August 8, 2016

Respectfully submitted,

/s/ Christy D. Jones
Christy D. Jones
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4523
christy.jones@butlersnow.com

/s/ David B. Thomas
David B. Thomas (W.Va. Bar #3731)
Thomas Combs & Spann PLLC
300 Summers Street
Suite 1380 (25301)
P.O. Box 3824
Charleston, WV 25338
(304) 414-1807
dthomas@tcspllc.com

/s/ Kelly S. Crawford
Kelly S. Crawford
Riker Danzig Scherer Hyland &
Perretti, LLP
Headquarters Plaza
One Speedwell Avenue
Morristown, NJ 07962-1981
(973) 451-8417
kcrawford@riker.com

COUNSEL FOR DEFENDANTS
ETHICON, INC. AND JOHNSON & JOHNSON

EXHIBIT A

	WAVE 2 CASE NAME	CASE NO.
1.	Bridgette Minogue v. Ethicon, Inc., et al.	2:12-cv-02112
2.	Kathryn Nelson v. Ethicon, Inc. et al.	2:12-cv-02203
3.	Carreen and Matthew Schroeder v. Ethicon, Inc., et al.	2:12-cv-01327

CERTIFICATE OF SERVICE

I hereby certify that on August 8, 2016, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Kelly S. Crawford

Kelly S. Crawford